

Snyder  
Randolph Harris

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1 appearance as to the way they look or shape and making  
2 sexual comments all the time around somebody.  
3 Q Is part of sexual harassment an element of  
4 unwantedness that the activity, whether it be speech or  
5 touch, whatever the activity is, has to be unwanted? Is  
6 that your understanding?  
7 A Yes.  
8 Q In other words, if there was a mutual flirtation  
9 going on, for example, would that be sexual harassment?  
10 A No, not if the other person, if both parties are  
11 involved.  
12 Q Okay. And when we went through the various lists  
13 earlier as far as touching yourself or another employee,  
14 touching someone's hair, et cetera, would there be  
15 circumstances where these activities could be appropriate  
16 and then other circumstances where these activities could be  
17 construed as inappropriate?  
18 A Yes.  
19 Q For example, if you scratched your arm, would you  
20 agree that that's touching yourself?  
21 A Yes.  
22 Q Would that be sexual harassment?  
23 A No.  
24 Q Have you ever received any legal training?

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1 A For sexual harassment?  
2 Q No. To be an attorney.  
3 A To be an attorney?  
4 Q Yes.  
5 A No.  
6 Q Are you a lawyer?  
7 A No.  
8 Q So your understanding of sexual harassment is not a  
9 legal based definition, is that correct?  
10 A Yes.  
11 Q I'm going to show you what was marked previously as  
12 Snyder 15. And this is a whole stack of papers. I just  
13 need you to look through it very briefly.  
14 You don't have to go through all of them. I  
15 just want you to get a sense of what they are. Do you have  
16 a sense at this point of what those documents reflect?  
17 A Yes. A lot of times are leaving and going to lunch  
18 and being okayed by Dennis, which he handled that anyway.  
19 He usually asked me if it was okay in passing and I would  
20 say, you know, it's okay.  
21 Q And can you just tell me, just for the record, what  
22 kind of documents they are?  
23 A E-mails from Terry Snyder to Dennis Ford and myself  
24 asking on several different days and times that she would

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1 like to take lunch or leave early or to make up time and  
2 take a 40-minute lunch break and she has asked several days  
3 in a row.  
4 Q And are those documents in line with what your  
5 experience was that you remember?  
6 A Yes.  
7 Q Do they reflect an attendance issue?  
8 A Yes.  
9 Q Okay. How so?  
10 A Well, she is leaving early, coming in late, taking  
11 long hours, taking long lunch breaks.  
12 Q And was that part of what led to the disciplinary  
13 writeup?  
14 A Yes.  
15 Q If I can just take them back for just a minute so I  
16 can see them. Sorry. I know it's a lot of paper.  
17 A There is a lot of paper. I didn't realize that.  
18 Q You testified earlier something about Ms. Snyder  
19 requesting to be -- I don't want to mischaracterize your  
20 testimony here. But something related to her mother going  
21 to Court. Do you recall that at all?  
22 A Yes.  
23 Q Do you recall what the Court was related to?  
24 A They were going to condemn her house.

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1 Q Okay. So there was some Court-related proceedings  
2 relating to that?  
3 A Yes. If I recall, I think there may have been some  
4 issues related to her mother and father having some  
5 problems.  
6 MS. DIBIANCA: Okay. That's all I have. I'll  
7 just reserve the right if Ms. Brewington is going to ask  
8 anymore questions.  
9 MS. BREWINGTON: Just a few.  
10 EXAMINATION  
11 BY MS. BREWINGTON:  
12 Q Mr. Harris, we have already established that the  
13 writeup occurred in March of 2003, correct?  
14 A Yes.  
15 Q Is it your belief that Terry's allegations that you  
16 asked her to wear a dress with no panties is payback for  
17 this writeup?  
18 A I don't know what her -- I don't know why she would  
19 make that statement.  
20 Q Well, you mentioned earlier about something about  
21 payback for a writeup, is that correct?  
22 A Yes. It's possible. That's my personal opinion, I  
23 guess, revenge.  
24 Q That the sexual allegations about panties is a

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1 revenge for the writeup?  
2 **A Yes.**  
3 Q And she came to your office to discuss the writeup  
4 in March of 2003, is that correct?  
5 **A Yes. Sometime during that time. After the writeup,**  
6 **I guess.**  
7 Q And you guys talked about the writeup at that time?  
8 **A She came in and asked me, yes, why did I get written**  
9 **up. She was making statements at that time.**  
10 Q Okay. And is that the conversation that we heard on  
11 the tape?  
12 **A I'm not for sure. I mean that sounds similar but**  
13 **I'm not for sure if that's when it was. She was yelling and**  
14 **saying things.**  
15 Q You're not sure when the tape was made?  
16 **A Yes. Right.**  
17 Q Okay. Was there mutual flirting between you and  
18 Terry Snyder?  
19 **A Depends on what you call flirting.**  
20 Q What do you call flirting?  
21 **A Hmm. That's a good question.**  
22 Q Well, my question is, was there mutual flirting  
23 between you and Terry Snyder? And I guess first we need to  
24 define flirting.

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1 **A Um-hmm.**  
2 Q Okay. What, in your opinion, is flirting?  
3 **A I don't know. That's a pretty broad statement. I**  
4 **guess it's what your mind is thinking when your gestures are**  
5 **happening. I mean you can wink at a guy, you know, if**  
6 **you're in a conversation or meeting or something. But if**  
7 **you wink at a girl, they may take it as flirting.**  
8 Q So based on your definition of flirting, was there  
9 any mutual flirting between you and Terry Snyder?  
10 **A I don't ever recall where I have put myself in a**  
11 **situation where she felt that I was flirting with her.**  
12 MS. BREWINGTON: Okay. I don't have anything  
13 further.  
14 MS. DiBIANCA: Me neither. I'm done.  
15 (Deposition concluded at 4:49 p.m.)  
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Examination by Ms. DiBianca		173
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HARRIS DEPOSITION		
NUMBER	DESCRIPTION	MARKED
1	Memo dated March 3, 2003, to Terri Snyder from Greg Buragino	69
2	E-mail from Terri Snyder to Dennis Ford dated February 6, 2003	77
3	E-mail from Carmella Patrone to Terri Snyder dated March 12, 2003	84
4	E-mail from Terri Snyder to Casters, et al, dated March 31, 2003	91
5	E-mail from Terri Snyder to Jim Ryan dated January 7, 2003	109
6	Document entitled, Managing Diversity in the Workplace	122
7	E-mail from Terri Snyder to Casters, et al, dated April 7, 2003	129
8	Handwritten document dated April 8, 2003	134
9	E-mail from killahbite@aol.com to Jerry Downie dated April 8, 2003	162

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REPLACE THIS PAGE  
WITH THE ERRATA SHEET  
AFTER IT HAS BEEN  
COMPLETED AND SIGNED  
BY THE DEPONENT.

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1 State of Delaware )  
2 )  
3 New Castle County )  
4

5 CERTIFICATE OF REPORTER

6 I, Allen S. Blank, Registered Merit Reporter and  
7 Notary Public, do hereby certify that there came before me  
8 on the 8th day of June, 2006, the deponent herein, RANDOLPH  
9 HARRIS, who was duly sworn by me and thereafter examined by  
10 counsel for the respective parties; that the questions asked  
11 of said deponent and the answers given were taken down by me  
12 in Stenotype notes and thereafter transcribed by use of  
13 computer-aided transcription and computer printer under my  
14 direction.

15 I further certify that the foregoing is a true and  
16 correct transcript of the testimony given at said  
17 examination of said witness.

18 I further certify that I am not counsel, attorney,  
19 or relative of either party, or otherwise interested in the  
20 event of this suit.

21 Allen S. Blank, RMR  
22 Certification No. 103-RPR  
23 (Expires January 31, 2008)  
24

DATED: June 19, 2006

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**In the Matter Of:**

**Snyder**

**v.**

**Citi Steel, USA, Inc.**

**C.A. # 04-970-JJF**

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**Transcript of:**

**Carmella Patrone**

**June 19, 2006**

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B-0476

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

TERRY L. SNYDER, )  
 )  
 )  
 Plaintiff, )  
 ) Civil Action  
 v. ) No. 04-970-JJF  
 )  
 )  
 CITI STEEL USA, INC., )  
 )  
 )  
 Defendant. )

Deposition of CARMELLA PATRONE taken pursuant to notice at the law offices of Margolis Edelstein, 1509 Gilpin Avenue, Wilmington, Delaware, beginning at 10:10 a.m. on Monday, June 19, 2006, before Eleanor J. Schwandt, Registered Merit Reporter and Notary Public.

APPEARANCES:

LORI A. BREWINGTON, ESQ.

MARGOLIS EDELSTEIN

1509 Gilpin Avenue

Wilmington, Delaware 19801

for the Plaintiff

MARGARET M. DIBIANCA, ESQ.

YOUNG, CONAWAY, STARGATT & TAYLOR

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for the Defendant

ALSO PRESENT: RAMONA F. CONNOR and JO BOYD, Interpreters

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1 (Ramona F. Connor and Jo Boyd, duly sworn as  
2 sign interpreters.)  
3 CARMELLA PATRONE,  
4 the witness herein, having first been  
5 duly sworn on oath, was examined and  
6 testified as follows:  
7 EXAMINATION  
8 BY MS. BREWINGTON:  
9 Q. Good morning, Carmella.  
10 A. Good morning.  
11 Q. I have the privilege of taking your deposition  
12 today. Terry Snyder has brought an action against  
13 CitiSteel. Are you familiar with that?  
14 A. I'm not familiar with what the actual lawsuit is  
15 about, but I know there is a lawsuit against. But I  
16 don't know the real details of it.  
17 Q. Have you ever testified in a deposition before?  
18 A. No.  
19 (Discussion off the record.)  
20 MS. DIBIANCA: We are going to say that for  
21 clarification purposes. Miss Patrone is going to be  
22 testifying with her answers verbally, and they will be  
23 taken down by the court reporter. But that the questions  
24 asked by Miss Brewington, and perhaps myself, will be

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1 translated by the interpreters into sign so that Carmella  
2 has a back-up, for clarification purposes.  
3 MS. BREWINGTON: Okay. That's fine.  
4 BY MS. BREWINGTON:  
5 Q. The reason why I ask if you have ever testified  
6 in a deposition before is because I wanted to make sure  
7 you are comfortable with what we are about to undergo  
8 here.  
9 I'm going to ask you a series of questions,  
10 and I will try to ask them one at a time. If at any time  
11 you don't understand anything that I'm asking you, just  
12 let me know and I'll try to explain it for you. Okay?  
13 A. Yes.  
14 Q. If at any time you need a break, just let me  
15 know. I don't anticipate going too long, but I tend to  
16 be off with that.  
17 We have a court reporter here and she will  
18 be taking down your responses.  
19 At times CitiSteel's attorney will object to  
20 some of the questions that I may ask you, and that's  
21 entirely proper. All I ask is that you answer the  
22 question unless she specifically advises you not to  
23 answer the question. Do you understand?  
24 A. Okay.

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1 Q. Okay. Could you please state your name for the  
2 record?  
3 A. Carmella Patrone.  
4 Q. And what did you do in preparation for your  
5 deposition testimony today?  
6 A. I'm sorry? Repeat that.  
7 Q. What did you do in preparation for your  
8 deposition testimony today?  
9 A. Other than just meeting with Molly, that's it.  
10 Q. Okay. And are you currently employed at  
11 CitiSteel?  
12 A. Yes.  
13 Q. How long have you been employed at CitiSteel?  
14 A. Eight years, I believe.  
15 Q. And what is your current position?  
16 A. Cost analyst.  
17 Q. Have you always been a cost analyst?  
18 A. No.  
19 Q. Could you take me through your employment with  
20 CitiSteel, beginning with I guess eight years ago?  
21 A. Okay. I was hired as a temp. Three months later  
22 I was hired permanently.  
23 Q. Were you in the melting shop at that time?  
24 A. No.

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1 Q. Tell me about that.  
2 A. I worked for the Finance Department, actually, as  
3 an accountant, and then it wasn't until November last  
4 year that I became cost analyst.  
5 Q. And what was your actual title in the Finance  
6 Department?  
7 A. Accountant.  
8 Q. Accountant, okay. And it was last year that you  
9 became the cost analyst?  
10 A. November.  
11 Q. November. Of 2005?  
12 A. Correct.  
13 Q. Do you enjoy your job at CitiSteel?  
14 A. Yes.  
15 Q. Many of my questions, almost all of them unless I  
16 tell you differently, they are going to be based on a  
17 time period when Terry Snyder was employed.  
18 A. Okay.  
19 Q. And that would be the time that you served as the  
20 accountant; is that correct?  
21 A. Yes, that's correct.  
22 Q. Tell me what some of your primary job  
23 responsibilities were as an accountant.  
24 A. Basically, account payable, inventory, and any

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2 (Pages 2 to 5)

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1 other project requested by the boss at the time.  
2 Q. Account payable and inventory. Who did you  
3 report to?  
4 A. At that time Allen Egner. A-L-L-E-N, E-G-N-E-R.  
5 Q. So other than account payable and inventory, is  
6 there anything else that you did?  
7 A. That's the general. I would say that's pretty  
8 much general. I mean, I could get into more details if  
9 you want.  
10 Q. Well, I probably want to get into detail in terms  
11 of the account payable and then the inventory and then  
12 anything else that you did.  
13 A. Month-end closure, that could be another  
14 responsibility.  
15 Q. Tell me about the inventory.  
16 A. Inventory, basically what I do is record all  
17 incoming I would say scrap, raw material and supplies  
18 that would go to making the finished product itself.  
19 Q. Okay. And where did you get the information to  
20 record?  
21 A. Two ways. One, the scrap yard is done through  
22 the computer system. They receive on their end.  
23 The other one, the raw material and the  
24 suppliers are done through bill of lading, submitted to

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1 me from the meltshop or the storeroom.  
2 Q. Now, what is Terry Snyder's involvement with  
3 accounting? Or what was her involvement?  
4 A. She was involved with the receiving aspect and  
5 also the usage part of it.  
6 Q. Tell me what you mean by that.  
7 A. As we received the material in the inventory --  
8 when I say material I'm talking about all three, the  
9 scrap, raw material and supplies.  
10 Q. Okay.  
11 A. Okay. The material as they come in, we are  
12 responsible for making sure they are received on time in  
13 the system, so that we can generate the report for the  
14 management. Because it is a high turn-over inventory,  
15 they have to be done very quickly, first thing in the  
16 morning.  
17 Then we are to monitor the usage part of it.  
18 The usages are recorded by the melters as they are being  
19 consumed to make the product, the heat, basically. We  
20 have to make sure the information is correct. Basically,  
21 monitor accuracy is what we do. And then that's it,  
22 pretty much, as far as that.  
23 And then we conduct a month-end inventory,  
24 the people at the meltshop, sometimes we would do it, we

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1 would conduct a physical inventory, make sure everything  
2 is accounted for. And then based on that, we actually do  
3 the month-end closing.  
4 Q. And what did Terry do?  
5 A. Terry is involved in everything that I just said.  
6 Q. Okay.  
7 A. She is responsible for the raw material and the  
8 supply. She doesn't really have anything to do with  
9 scrap receiving. She received them into various systems,  
10 like spreadsheet system. We have like a standard cost  
11 system. And she received them in, and she also double  
12 checked the usage. She updated the system and verify the  
13 information is correct before submitting the report to  
14 management.  
15 Q. Where does Terry get the information to do her  
16 part of the job?  
17 A. Well, from the receipt, that would be from the  
18 meltshop or from the storeroom. And the usage is done  
19 automatically through the system, in CitiPro. That's  
20 what the system is called. C-I-T-I-P-R-O.  
21 Q. Okay. And when you say that she receives the  
22 information for the receipts from the, did you say the  
23 Meltshop Department?  
24 A. Yes, the meltshop.

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1 Q. Who is it that gets her that information?  
2 A. Well, it depends on the material being received.  
3 Raw material is generally received directly into the  
4 Meltshop Department.  
5 Q. Okay.  
6 A. Whoever physically signs off on the bill of  
7 lading is supposed to pass the bill of lading to the main  
8 office so that she can use it to record it as being  
9 received.  
10 Q. Are there other employees that are supposed to do  
11 this?  
12 A. You mean recording receipt?  
13 Q. Yes.  
14 A. No. She is primarily the only one that does  
15 that.  
16 Q. I guess what I'm trying to understand is, there  
17 is things such as the physical inventory and the ISO  
18 reports that I have seen in documents, and I'm trying to  
19 understand what Terry's relationship is to those  
20 documents.  
21 A. The ISO you mean? B- 0479  
22 Q. Yes.  
23 A. I don't know anything about the ISO. I'm not  
24 sure what that is. But I do know that she has other

3 (Pages 6 to 9)

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1 **things she has to do at the same time.**  
2 Q. All right. I'll ask you about that. How about  
3 the melters' update usage, do you know what that is?  
4 **A. From CitiPro?**  
5 Q. Yes.  
6 **A. What I'm familiar basically, if I understand**  
7 **correctly, is I update the usage from CitiPro into the**  
8 **standard cost system. Is that what you are referring to?**  
9 Q. What is Terry's role with that?  
10 **A. She basically verifies that the usage is correct**  
11 **in CitiPro, basically.**  
12 Q. What does she use to verify that information?  
13 **A. I really don't know.**  
14 Q. Terry served CitiSteel as a clerk/typist; is that  
15 correct?  
16 **A. I guess so. I mean, that would make sense, but I**  
17 **couldn't say that's the actual title.**  
18 Q. You weren't familiar with what role she actually  
19 played at CitiSteel?  
20 **A. Not overall. Just only in regarding to me and**  
21 **her reporting, working with me.**  
22 Q. Okay.  
23 MS. CONNOR: I'm sorry, could you reask your  
24 last question, please?

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1 MS. BREWINGTON: I don't know what it was.  
2 (Record read.)  
3 (Discussion off the record.)  
4 (Patrone Deposition Exhibit 1 was marked for  
5 identification.)  
6 BY MS. BREWINGTON:  
7 Q. Could you tell me what this document is.  
8 **A. I need a minute to read it.**  
9 Q. Okay. Sure.  
10 (Discussion off the record.)  
11 **A. Okay. This is about --**  
12 Q. First, if you could just tell me what it is and  
13 then you can tell me what it is about.  
14 **A. Oh. It is just an e-mail that I had written to**  
15 **Terry, regarding to the job performance review she had.**  
16 Q. And it is dated?  
17 **A. And it was particularly about Greg Vurgino, and**  
18 **she had said that Greg had mentioned my name, stating**  
19 **that she was not doing a good job, and I told her that it**  
20 **wasn't true.**  
21 Q. And just for the record, this e-mail is dated  
22 Wednesday, March 12th, 2003. I would like you to go  
23 paragraph by paragraph for me, if you would. Could you  
24 read for me the first paragraph, not that first sentence

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1 but the first paragraph out loud.  
2 **A. You want me to read it out loud?**  
3 Q. If you could, please.  
4 **A. "Anyway, I didn't read your e-mail carefully the**  
5 **first time. I thought you said 'they' said I came up to**  
6 **them and complained about your job performance. I didn't**  
7 **read carefully that it was Greg who went around asking**  
8 **everyone about you. That part is true, he did ask me**  
9 **about a week ago, but I know I didn't say anything that**  
10 **indicate you weren't doing your job. Greg wanted to know**  
11 **if you were doing everything you were supposed to do and**  
12 **I told him that you're doing everything that you can do**  
13 **under the circumstances and the example I gave him was**  
14 **that it was difficult for you to complete the alloy/flux**  
15 **usage verification before 7:30 a.m. because of other**  
16 **responsibilities you had like ISO's and other morning**  
17 **reports. I also said that you don't get the Melter's**  
18 **report till after 7:30 a.m. I told him that I felt you**  
19 **were given too much responsibilities that makes it hard**  
20 **for you to meet certain deadlines. Also, you can't do**  
21 **your job if other people don't provide you with the**  
22 **necessary information you need, for example, physical**  
23 **inventory numbers."**  
24 Q. Okay. Did you have a conversation with Greg

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1 about this, what is discussed in the first paragraph?  
2 **A. Basically, as I said here, he asked me, and I**  
3 **told him basically what I said in here.**  
4 Q. Okay. Did he respond to you in any way?  
5 **A. No. Because Terry did not want me to -- oh, you**  
6 **mean when he first asked me?**  
7 Q. Yes. When you told him this, did he say anything  
8 back to you?  
9 **A. No, he didn't.**  
10 Q. Did Greg ask other people about Terry's  
11 performance?  
12 **A. I have no clue.**  
13 Q. Well, you indicate here that Greg went around  
14 asking everyone about you. Is that true? I think it is  
15 the third sentence.  
16 **A. If I -- I got that impression, but I don't know**  
17 **where I got that impression from.**  
18 Q. Okay. But he asked you about Terry?  
19 **A. Yes, he asked me, right.**  
20 Q. Did you feel that Terry was given too much  
21 responsibility?  
22 **A. Yes.**  
23 Q. Tell me about that. Why did you feel that way?  
24 **A. I felt it was too much responsibility in regard**

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4 (Pages 10 to 13)

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1 to meeting the deadlines in the morning.  
2 Q. Okay. And what about these alloy/flux usage  
3 verifications, did you feel like that was too much of a  
4 responsibility?  
5 A. The responsibility itself is not -- the  
6 responsibility, no. But not having the information in  
7 order to do it, yes.  
8 Q. Okay.  
9 A. That was the hold-up.  
10 Q. And where does that information come from?  
11 A. That comes from other people, like the melters  
12 and storeroom.  
13 Q. So is it fair to say that she has to rely on  
14 other people to complete her job duties?  
15 A. Definitely, she has to.  
16 Q. Okay. Is that what you meant by that last  
17 sentence, "Also, you can't do your job if other people  
18 don't provide you with the necessary information you  
19 need"?  
20 A. Yes, that is correct.  
21 Q. And that's what you told Greg?  
22 A. Yes.  
23 Q. The second paragraph, if you could read that out  
24 loud for me.

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1 A. Sure. "Greg didn't ask specifically about the  
2 morning reports, that was just an example I gave to him  
3 to make him understand that it wasn't 'you' but rather  
4 the 'various responsibilities & deadlines' they'  
5 demanded on you was the issue but I guess he didn't  
6 interpret it that way. But that's not a problem. I have  
7 no problem whatsoever in going to Greg and straightening  
8 that out but I won't go against your wish. If you don't  
9 want me to say anything because you feel they might hold  
10 that against you, I would respect your wish. But anytime  
11 you need me to straighten this out just let me know and  
12 I'll do it."  
13 Q. Okay. Who is "they"? You put "they" in quotes.  
14 A. Well, when Terry had told me that they all had a  
15 meeting about her performance, I think that's where I got  
16 the impression of "they."  
17 Q. Whoever was involved in the meeting?  
18 A. Right.  
19 Q. Do you know any of the names of the people  
20 involved?  
21 A. Oh, I know Greg would be one. And Randolph  
22 Harris. I'm assuming Dennis Ford. But no, other than  
23 that, no.  
24 Q. Do you assume Dennis Ford because that's one of

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1 the people she reported to?  
2 A. Yes.  
3 Q. Okay. In the last sentence you indicate, "If you  
4 don't want me to say anything because you feel they might  
5 hold that against you, I will respect your wish," is that  
6 something Terry told you?  
7 A. Yes, she requested -- I told her I would be glad  
8 to straighten it out, and she said no, she would prefer I  
9 didn't say anything.  
10 Q. So you never said anything to Greg to clear it  
11 up?  
12 A. Right.  
13 Q. Okay. Do you know why Greg asked you about her  
14 performance?  
15 A. I just assumed he wanted to know in general how  
16 things were going.  
17 Q. Oh, so not specifically Terry Snyder?  
18 A. No, he did ask about her.  
19 Q. Okay.  
20 A. But he didn't say in any case that they were  
21 evaluating her performance or anything like that. I got  
22 it he was trying to evaluate the operation aspect of it.  
23 Q. Okay. The third paragraph, if you could read  
24 that for me.

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1 A. "Of course the other problem is that I'm" -- let  
2 me repeat that.  
3 "Of course, the other problem is that I'm  
4 also holding you back with not staying on top of training  
5 you with Standard Costs like giving you updated Vendor's  
6 code and training you with the new meltshop supplies  
7 program so that's my fault, not yours and I will point  
8 that out when we have that meeting. I told Jeff and  
9 Dennis this but I don't recall ever telling Greg about  
10 it. Greg and I didn't even talk more than two minutes,  
11 that's how brief it was. Now I wish I had taken the time  
12 to elaborate more. I thought he was asking because he  
13 was trying to find ways to improve the workload. Had I  
14 known it was to try to find fault in your job  
15 performance, I would have made it clear that I was  
16 certainly happy with what you've been doing. Actually,  
17 you have been doing a lot more than before that's for  
18 sure. I'm actually annoyed with myself for not thinking  
19 this one through."  
20 Q. So were you happy with Terry's job performance?  
21 A. Yes.  
22 Q. Did you feel as if Greg was trying to find fault  
23 in her job performance?  
24 A. Not when he had asked me questions about it, no.

5 (Pages 14 to 17)



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1 Q. Did that change somehow?  
2 **A. When she had told me that they had a meeting**  
3 **about her job performance. That's when I realized, okay,**  
4 **they were talking about her performance and not the work,**  
5 **the work itself.**  
6 Q. Were you responsible for training Terry?  
7 **A. Yes.**  
8 Q. What did you have to train her on?  
9 **A. I had to train her basically two parts. One is**  
10 **through the spreadsheet, which she was proficient in**  
11 **doing. The other one was through standard cost system,**  
12 **and that was the one that I never had the time to do. I**  
13 **felt that I needed -- it was necessary for me to do it.**  
14 Q. So the standard cost system was the part of your  
15 job that you were responsible for training her for that  
16 you didn't have the time to do?  
17 **A. Correct, so that she could take over, basically.**  
18 Q. Okay. Who was doing it prior to --  
19 **A. I was.**  
20 Q. But that was part of Terry's job?  
21 **A. It was supposed to be part of Terry's job, yes.**  
22 Q. Was that an issue with her performance?  
23 **A. I don't know. They didn't say specifically about**  
24 **her performance. They were questioning. It was just**

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1 **overall, general statement that I got.**  
2 Q. Did you feel responsible somehow for Terry not  
3 doing as well on her performance evaluation?  
4 **A. No, because even though I didn't train her with**  
5 **that, that should not have kept her from doing other**  
6 **things.**  
7 Q. Okay.  
8 **A. I mean, I simply just kept doing it rather than**  
9 **handing it over to her. But it should not have -- it**  
10 **shouldn't have hindered performance she was doing before**  
11 **then.**  
12 Q. Okay. Well, how about the physical inventory,  
13 not having the physical inventory reports, would that  
14 have hindered from doing her job?  
15 **A. Oh, definitely.**  
16 Q. Is there anything that you can think of that  
17 would have hindered her from doing her job?  
18 **A. Just basically, as I said, other people not**  
19 **submitting the paperwork really on time. Timing is an**  
20 **issue to her job, so that she can do her job.**  
21 Q. I think we are on the fourth paragraph.  
22 **A. Okay. "Let's definitely do lunch on Friday so we**  
23 **can talk about this in details. Also, we might as well**  
24 **take advantage of outlining notes and issues to discuss**

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1 **when we do have that inventory meeting. Does that sound**  
2 **good to you? This would be a good opportunity for me to**  
3 **set the record straight about your job performance cause**  
4 **I can point out 'their' problems and not your's. The**  
5 **storeroom receipts of course is still an issue which you**  
6 **did point out. Good thing I saved a bunch of them to**  
7 **show them so they know we are not just making this up.**  
8 **Till we meet on Friday, do whatever you have to do to**  
9 **'cover your butt', even if that means you have to send me**  
10 **'formal' e-mails with 'cc' to everyone else, that's fine**  
11 **with me, got no problem with that."**  
12 Q. Okay. What did you mean by, I think it is the  
13 last sentence there, "do whatever you have to do to  
14 'cover your butt', even if that means you have to send me  
15 'formal' e-mails and 'cc' to everyone," what did you mean  
16 by that?  
17 **A. What I meant was, from reading this, the**  
18 **impression I got was everyone thought that she wasn't**  
19 **doing anything, so for the record, to basically see she**  
20 **was doing something she would have to send me a formal**  
21 **e-mail basically outlining what we were doing.**  
22 Q. What would the e-mails be? Did she end up  
23 sending these e-mails to you after this?  
24 **A. Well, I think after this, I think it was only two**

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1 **weeks, then she was no longer with us.**  
2 Q. Oh, okay.  
3 **A. So there was no -- I'm not sure what your**  
4 **question is, now that I think of it.**  
5 Q. I'm not really sure what it is either. I guess I  
6 wanted to know if she actually followed through and  
7 listened to you, took your advice and sent you these  
8 e-mails, but I think your answer is she wasn't there  
9 long enough --  
10 **A. Right.**  
11 Q. -- to do that?  
12 **A. That's correct.**  
13 Q. I don't want to put words in your mouth. Okay.  
14 The next short paragraph, if you could read for me?  
15 **A. The last one? Okay.**  
16 **"By the way, since they're giving you a hard**  
17 **time about coming over here, that's no problem...I'll**  
18 **just come up to your office instead when I'm ready to**  
19 **train you with the supplies in Standard Cost. Okay with**  
20 **you?"**  
21 Q. Were they giving Terry a hard time about coming  
22 over to see you?  
23 **A. Yes. According to Terry she said yes, they were.**  
24 Q. Okay. Where are you located with respect to

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6 (Pages 18 to 21)

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1 where she was located? She was in the melting shop,  
2 right?  
3 **A. Right, that's correct.**  
4 Q. And you were in accounting?  
5 **A. I was in the main building.**  
6 Q. Finance Department?  
7 **A. Correct.**  
8 Q. Where is that compared to where she is?  
9 **A. Okay. The meltshop, basically, is in one**  
10 **location.**  
11 Q. Okay.  
12 **A. And the main building is basically across the**  
13 **street, in a different location.**  
14 Q. And so Terry told you that they had issues with  
15 her coming to see you?  
16 **A. Correct.**  
17 Q. When Terry came to see you --  
18 **A. You have the paper up.**  
19 Q. Oh, I'm sorry.  
20 **A. You can't do that.**  
21 Q. When she came to see you was she doing work with  
22 you?  
23 **A. Was she what?**  
24 Q. Was she working with you when she came to see

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1 you?  
2 **A. Oh, yes.**  
3 Q. Oh, okay. Do you know why they would have issues  
4 with that then?  
5 **A. No.**  
6 Q. Did that make sense to you?  
7 **A. No, it doesn't.**  
8 Q. All right. Did Terry tell you that she was being  
9 sexually harassed?  
10 **A. Yes.**  
11 Q. I'm sorry. I want to look up and tell you that.  
12 I'm looking at my notes, but I want to try to remember.  
13 Your answer was yes?  
14 **A. Yes.**  
15 Q. Do you remember when she told you? And when I  
16 say "when," I want to know the first time, because I  
17 don't know whether there was more than one time she told  
18 you about it, but let's go in chronological order if we  
19 could, the very first time that she told you she was  
20 being sexually harassed?  
21 **A. I can't give you a date, that's for sure.**  
22 Q. That's okay. I understand.  
23 **A. I can give you the season. I do remember it was**  
24 **like in the wintertime. I think it was toward the end of**

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1 **the year.**  
2 Q. Okay. Let's do this. Terry was hired in August  
3 of 2001. And her last day of employment was in April of  
4 2003. Okay? I'm going to represent that to you. And  
5 your answer was in the winter sometime. Do you think it  
6 was in the winter of 2003?  
7 **A. I couldn't confirm that.**  
8 Q. It may have been before that?  
9 **A. Like I said, I can't confirm that. I don't know.**  
10 Q. That's fine. Was it when she was employed at  
11 CitiSteel?  
12 **A. Yes.**  
13 Q. What did she tell you that very first time, if  
14 you can remember?  
15 **A. Basically, that she was being harassed. She**  
16 **wasn't sure what to do about it. And she was basically**  
17 **asking for my advice.**  
18 Q. Where were you at the time; do you remember?  
19 **A. When she told me? No. I don't recall.**  
20 Q. It is difficult to remember things like that.  
21 Do you remember what your response was to  
22 her?  
23 **A. Yes. I basically told her to report it to human**  
24 **resource.**

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1 Q. Did you say anything else?  
2 **A. I think she wasn't comfortable with that. So I**  
3 **encouraged her to try to talk to the management, like**  
4 **Dennis Ford about it. But she wasn't comfortable with**  
5 **that either.**  
6 Q. And what exactly did she tell you?  
7 **A. She didn't say a whole lot the first time.**  
8 Q. Okay.  
9 **A. It was just generalization really. She was being**  
10 **harassed.**  
11 Q. I'm sorry. I'm sorry. I thought you were  
12 finished. Go ahead.  
13 **A. She was just being sexually harassed.**  
14 Q. She used the term "sexually harassed"?  
15 **A. Yes.**  
16 Q. And she said it was by Randolph Harris?  
17 **A. I don't recall if she said that the first time.**  
18 Q. She did not provide any details of the sexual  
19 harassment at that time?  
20 **A. Not in the beginning.**  
21 Q. Okay. And did there come a time when she told  
22 you again that she was being sexually harassed?  
23 **A. Yes.**  
24 Q. And when was that?

7 (Pages 22 to 25)

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1 **A. That I don't recall. I cannot remember. She**  
2 **just did.**  
3 Q. She just did. Okay. How many months after the  
4 first time?  
5 **A. When she first told me?**  
6 Q. Yes. I'm thinking some time in the wintertime of  
7 some year before she was terminated or before she ended  
8 her employment, April 2003. So in the wintertime prior  
9 to April 2003 is when she first told you, correct?  
10 **A. That would make sense.**  
11 Q. And the second time you guys discussed it was  
12 probably, do you know?  
13 **A. No. I couldn't recall.**  
14 Q. That's okay. Was it within a week of that first  
15 time?  
16 **A. It has been so long, I don't really...**  
17 Q. That's fair. That's fine. Do you remember  
18 anything about that conversation?  
19 **A. The first one?**  
20 Q. The second one.  
21 **A. No. We had several so I could not remember.**  
22 Q. I'm sorry. You've had several conversations or  
23 several conversations about the sexual harassment?  
24 **A. I'm not sure I understand the two questions.**

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1 Q. Okay. That's fair. Did you talk with her on  
2 more than two occasions about the sexual harassment?  
3 **A. She spoke with me on more than two occasions,**  
4 **yes.**  
5 Q. Approximately how many times?  
6 **A. You want me to take an educated guess?**  
7 Q. An educated approximation, yes.  
8 **A. Probably at least four or five times.**  
9 Q. Okay. And that would be at least four or five  
10 times between the winter of some year and April 2003?  
11 **A. Correct.**  
12 Q. Okay.  
13 **A. That's correct.**  
14 Q. When would you discuss the sexual harassment?  
15 Would it be at work?  
16 **A. It would be at work or off-site.**  
17 Q. Was Terry upset or was she angry?  
18 **A. She was both.**  
19 Q. She was both?  
20 **A. Mm-hmm.**  
21 Q. And I know I asked you about your response the  
22 first time that she told you. Did that response change  
23 or did you say something else that you can remember?  
24 **A. I'm not sure what you mean.**

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1 Q. Okay. When I asked you about the first time she  
2 came to you and you said she spoke generally about sexual  
3 harassments, and I asked you your response, and you said  
4 that you told her that she should go to human resource or  
5 talk with Dennis Ford?  
6 **A. Right.**  
7 Q. I guess my question is: You also spoke with her  
8 four or five times after that; is that correct?  
9 **A. Correct.**  
10 Q. And my question is: Did your response to her  
11 change in any way?  
12 **A. No, I maintained she should report it.**  
13 Q. Okay.  
14 **A. She had asked me for several opinions, but you**  
15 **have to jog my memory about the question, though.**  
16 Q. Okay. Do you remember anything about what she  
17 said about the sexual harassment?  
18 **A. You mean like details of it?**  
19 Q. Like who it was that sexually harassed her or any  
20 -- I don't want to put words in your mouth. Did she give  
21 you details of what happened to her with respect to the  
22 sexual harassment?  
23 **A. She did identify it was Randolph Harris. She had**  
24 **explained to me several incidents. I'm going to call**

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1 **them incidents because I don't remember them all in**  
2 **details.**  
3 Q. Okay.  
4 **A. But she did disclose them. There is only one**  
5 **that stands out in my mind, and that was a comment he**  
6 **supposedly made to her about how she should dress.**  
7 Q. What was that comment?  
8 **A. I don't know it word by word, but basically it**  
9 **was like she was supposed to come into work on a**  
10 **Saturday, basically what he said was, "Wear a dress with**  
11 **no panties."**  
12 Q. And that was said by Randolph Harris?  
13 **A. That's what she said.**  
14 Q. Okay. Did she tell you how she responded to him?  
15 **A. I don't remember that particular incident. But**  
16 **in general, I think she made it pretty clear she didn't**  
17 **like it.**  
18 Q. What did you think when you heard her, when she  
19 told you that? You don't understand? That's okay.  
20 **A. I'm not sure what you mean.**  
21 Q. I'm going back to the conversation where she told  
22 you about an incident with Randolph Harris and she told  
23 you that Randolph asked her to come to work on a Saturday  
24 wearing a dress with no panties.

8 (Pages 26 to 29)

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1 **A. Mm-hmm.**  
2 Q. And I want to get from you what you thought about  
3 that.  
4 **A. The comment itself?**  
5 Q. Yes.  
6 **A. I thought it was degrading.**  
7 Q. Did you have any reason to think she was lying  
8 about that?  
9 **A. No.**  
10 Q. Did you believe her?  
11 **A. Yes.**  
12 Q. Has your opinion changed at all?  
13 **A. No.**  
14 Q. Now, you mentioned that there were, I believe,  
15 and correct me if I'm wrong, several incidents, but you  
16 can only remember that one?  
17 **A. Only the comment that was made, yes.**  
18 Q. Okay. Do you remember anything about any other  
19 comments?  
20 **A. No.**  
21 MS. BREWINGTON: Off the record.  
22 (Discussion off the record.)  
23 (Recess taken.)  
24 MS. BREWINGTON: I would like to show you

1 really talk to her after that?  
2 **A. No. We both agreed it was best not to.**  
3 Q. Why did you feel it was best not to talk to Terry  
4 anymore?  
5 **A. She had already obtained a lawyer, and he was the**  
6 **one that actually said it was best that we don't have**  
7 **anymore contact, and so I kind of agreed and I said okay,**  
8 **and so we have never had any contact.**  
9 Q. Do you know who that lawyer was?  
10 **A. No, I don't know his name.**  
11 Q. It was a he though?  
12 **A. I got the impression, yes, it was a he.**  
13 Q. Okay. So did you talk with her at all  
14 afterwards?  
15 **A. After that conversation?**  
16 Q. No. Her employment ended April 10th, 2003.  
17 Okay. I'm going to represent that to you. So April of  
18 2003. Do you remember when you had that conversation  
19 with her?  
20 **A. About ceasing contact?**  
21 Q. Yes.  
22 **A. Oh, that was after the incident.**  
23 Q. It was after April 10th of 2003?  
24 **A. Right.**

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1 another document if I could.  
2 (Patrone Deposition Exhibit 2 was marked for  
3 identification.)  
4 THE WITNESS: Do you want me to read it to  
5 myself?  
6 BY MS. BREWINGTON:  
7 Q. Go ahead and review it first.  
8 **A. Okay.**  
9 Q. First, just tell me what this document is, just  
10 for the record, so it is clear on the record.  
11 **A. To me, it seemed that it is just a basic**  
12 **conversation, Terry just apologizing for, you know,**  
13 **pouring her heart or coming to me with a problem, and I**  
14 **just basically said it was no big deal, it was okay.**  
15 Q. It is an e-mail and it is dated Monday, April  
16 7th, 2003; is that correct?  
17 **A. That's correct. That's what the e-mail says.**  
18 Q. Were you friends with Terry?  
19 **A. Yes, I guess you could say. We were friends, but**  
20 **we really worked closely, a lot.**  
21 Q. Are you still friends with Terry?  
22 **A. We have not had any contact since shortly after**  
23 **this incident.**  
24 Q. So shortly after her employment ended, you didn't

1 Q. Was it a month afterwards? Two months  
2 afterwards?  
3 **A. The time frame, I don't recall. But I could say**  
4 **probably after the third time we got together.**  
5 Q. Oh, okay.  
6 **A. About. That's an approximate.**  
7 Q. That's okay. So you got together approximately  
8 three times after she ended her employment with  
9 CitiSteel; is that correct?  
10 **A. Right. After the incident. I just call it the**  
11 **incident.**  
12 Q. Okay. We will call it the incident then. After  
13 the incident, three times after that, then you ceased  
14 contact?  
15 **A. Right.**  
16 Q. Both of you. Okay. I just needed to understand.  
17 Did your father suggest not to continue  
18 contact with Terry?  
19 **A. He made that suggestion too.**  
20 Q. Now, I would like to ask you about this e-mail.  
21 You've had an opportunity to review it, right?  
22 **A. Mm-hmm.**  
23 Q. Did you discuss the sexual harassment with Terry  
24 on this day, that's April 7th, 2003?

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9 (Pages 30 to 33)



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1 **A. On April 7th, you mean that day?**  
2 Q. Yes, on this day.  
3 **A. From the e-mail, that is the impression, it seems**  
4 **that there was a conversation.**  
5 Q. Okay. But you don't remember a specific  
6 conversation on that day?  
7 **A. No, no.**  
8 Q. That would just be based on what you are seeing  
9 in front of you?  
10 **A. Right, what I'm...**  
11 Q. Does this e-mail help refresh your recollection  
12 of an incident with Terry discussing the sexual  
13 harassment?  
14 **A. The details, no.**  
15 Q. Does it help you remember anything?  
16 **A. No. I'm not sure what is it you are asking for.**  
17 Q. I guess I'm trying to understand, after reviewing  
18 this e-mail, does this help jog your memory of a time  
19 that you talked about the sexual harassment with Terry?  
20 **A. I would have to say no. Nothing is coming to my**  
21 **mind.**  
22 Q. Well, tell me about what this e-mail basically  
23 says between the two of you.  
24 **A. Well, based on this e-mail, it started the second**

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1 **day she started there. She was just basically explaining**  
2 **why she did not feel comfortable reporting it, because**  
3 **she was a temp at the time, and who is going to believe**  
4 **her, it is her word against his. That's pretty much it.**  
5 **Pretty much, I mean...**  
6 Q. Did she tell you at any time that she didn't want  
7 to see Randolph Harris fired?  
8 **A. Oh, yes.**  
9 Q. Did she tell you that she loved her job and  
10 didn't want to lose it?  
11 **A. Yes.**  
12 Q. Do you know whether she talked about the sexual  
13 harassment with anyone else at CitiSteel?  
14 **A. I don't believe she did. I mean, at least I am**  
15 **not familiar with that conversation, no.**  
16 Q. Would you consider yourself her confidant?  
17 **A. I'm not sure what that means.**  
18 Q. I guess, would you consider yourself the one that  
19 she confided in about the sexual harassment?  
20 **A. Yes.**  
21 Q. Did you feel uncomfortable when she would talk to  
22 you about the sexual harassment?  
23 **A. No, I wasn't.**  
24 Q. You responded to her in the e-mail like right

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1 above that and you indicate, "You can pour out your  
2 problems anytime you need to. I certainly understand  
3 what you're going through." Did you understand what she  
4 was going through?  
5 **A. Based on what she has been telling me.**  
6 Q. What did you understand about what she was going  
7 through?  
8 **A. That she was being sexually harassed and she just**  
9 **got stuck. That's basically the way I got the**  
10 **impression.**  
11 Q. Why did you think she was stuck?  
12 **A. She didn't want to report it to human resource,**  
13 **at the same time her saying no wasn't stopping the whole**  
14 **thing either. But she didn't want to lose -- she didn't**  
15 **want to quit either. She liked her job.**  
16 Q. So was it your understanding that she had told  
17 Randolph she wasn't interested and she said no to his  
18 advances?  
19 **A. Yes.**  
20 Q. Okay. Do you know why she didn't want to tell  
21 human resources? Did she tell you that?  
22 **A. Basically, she didn't want to lose her job, and**  
23 **she didn't want it to become an uncomfortable situation,**  
24 **when everybody knows about it. Her word against his.**

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1 Q. Do you know why she thought she was going to lose  
2 her job?  
3 **A. Why she thought she would lose her job?**  
4 Q. Yes.  
5 **A. No, I can't really speak for her mind, no.**  
6 Q. I didn't think you could. I was wondering if  
7 that might jog your memory, like maybe she told you why.  
8 But if she didn't, that's okay.  
9 **A. No.**  
10 Q. The next sentence is, "Hopefully we will figure  
11 out something to do about it tomorrow night when we get  
12 together okay."  
13 Carmella, were you trying to help her to  
14 figure out how to handle this situation?  
15 **A. At the time, yes. But what the situation was, I**  
16 **don't remember.**  
17 Q. Oh, the specifics of whatever --  
18 **A. Right. I mean, she would come to me each time**  
19 **with different situations asking for advice. But what**  
20 **the situation is, I don't recall.**  
21 Q. But you do think it was about sexual harassment?  
22 **A. Yes, there have been occasions, yes.**  
23 MS. BREWINGTON: If I could have that marked  
24 as Patrone 3.

10 (Pages 34 to 37)

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1 (Patrone Deposition Exhibit 3 was marked for  
2 identification.)  
3 Q. The top of this e-mail is an e-mail from Terry  
4 Snyder to yourself; is that correct?  
5 **A. Correct.**  
6 Q. And it is dated Wednesday, April 9th, 2003; is  
7 that also correct?  
8 **A. Correct.**  
9 Q. And that's actually two days after the previous  
10 exhibit is dated?  
11 **A. That's correct.**  
12 Q. I just want to ask you about the top portion of  
13 this e-mail, this paragraph, it begins with "Carmella,"  
14 coma.  
15 **A. Okay.**  
16 Q. Do you remember receiving this e-mail?  
17 **A. Yes.**  
18 Q. The first sentence begins off with, "You were  
19 wrong...Jerry, Greg or Dennis warned him (one of the  
20 three)...Randolph walked in at 7:14 a.m. (usually rushing  
21 in at 7:15) without his briefcase said good morning to  
22 the" -- okay. I don't think there is a period, so that  
23 would cause me to read the whole paragraph.  
24 The only thing I'm concerned about really is

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1 this first sentence, "You were wrong...Jerry, Greg or  
2 Dennis warned him." Do you know what that is about?  
3 **A. No. But I know that she had reported to it human**  
4 **resources.**  
5 Q. Did she -- I'm sorry.  
6 **A. But I don't remember what it was about, though.**  
7 Q. Okay. Did you know that she was going to report  
8 it to human resources?  
9 **A. Yes.**  
10 Q. Did she tell you before she was going to do it?  
11 **A. Can you move your hand, please?**  
12 Q. I'm sorry. I'm sorry.  
13 **A. That's okay.**  
14 Q. Did she tell you that she was going to report it  
15 to human resources before she actually did it?  
16 **A. Yes. Well, I don't know if before or after, but**  
17 **she did tell me.**  
18 Q. Okay. But you don't have any idea what you may  
19 have been wrong about?  
20 **A. No.**  
21 Q. Terry Snyder, her employment ended in April of  
22 2003. Okay. The actual date was April 10th. What is  
23 your understanding of why she left CitiSteel?  
24 MS. DIBIANCA: I'm going to object to the

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1 extent that it calls for speculation. And the witness  
2 can go ahead and answer.  
3 THE WITNESS: So I can go ahead and answer  
4 the question? Okay.  
5 Please repeat the question.  
6 BY MS. BREWINGTON:  
7 Q. What is your understanding of why Terry left  
8 CitiSteel?  
9 **A. My understanding was there was a meeting with**  
10 **her, Jerry Downie, Jim Ryan. I don't know if there was**  
11 **any other person, but I know it was at least them three.**  
12 **They had a meeting regarding the sexual harassment**  
13 **complaint she filed. They basically offered her two**  
14 **options. One was to take a transfer to shipping. The**  
15 **other one was voluntary resignation. And that was it.**  
16 **So that's what I was told, but I'm not sure,**  
17 **what is it you wanted me to --**  
18 Q. That's fine. I just wanted to know what your  
19 understanding was. That's what you were told; is that  
20 correct?  
21 **A. Correct.**  
22 Q. Were you told that by Terry?  
23 **A. Yes.**  
24 Q. Did you discuss this incident with anyone else?

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1 **A. No.**  
2 Q. Were you aware that CitiSteel was going to  
3 eliminate the clerk/typist position in the meltshop?  
4 **A. No, I was not aware.**  
5 Q. So you weren't aware of that at any time? I'm  
6 even talking about now.  
7 **A. Any time.**  
8 Q. Okay. Do you know who the clerk/typist was in  
9 the plate mill, the name of the person?  
10 **A. Oh, no clue.**  
11 Q. No clue. Like you are just not even -- okay,  
12 okay?  
13 MS. CONNOR: I'm sorry clerk/typist where?  
14 MS. BREWINGTON: In the plate mill.  
15 BY MS. BREWINGTON:  
16 Q. How about the name of the clerk/typist in the  
17 shipping department in April of 2003?  
18 **A. I don't know who that is either.**  
19 Q. Do you not work with those people?  
20 **A. No, I don't work closely with the paper or the**  
21 **shipping department.**  
22 Q. It is just the melting shop?  
23 **A. Correct.**  
24 Q. Who did Terry Snyder's job after she left in

11 (Pages 38 to 41)

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1 April of 2003?  
2 **A. They hired a temp. Actually, I really can't**  
3 **answer that because I don't know in chronological order**  
4 **who did it exactly. They did hire someone, but it didn't**  
5 **last long.**  
6 Q. Okay. Do you remember the name of the person  
7 that they hired?  
8 **A. No, as I said. Actually, you know what, I'm not**  
9 **even sure if they did hire anybody after that. They**  
10 **might have just distributed the job to other people.**  
11 MS. BREWINGTON: If I could step out for two  
12 minutes and consult, and I'll come right back. See if I  
13 have anything else.  
14 (Recess taken.)  
15 BY MS. BREWINGTON:  
16 Q. I just have a few more questions for you. We  
17 have previously discussed that Terry's employment ended  
18 April 10th of 2003. And my question that I'm getting  
19 ready to ask you is going to be about that specific time  
20 period in or around April of 2003.  
21 **A. Okay.**  
22 Q. Was there a time when Jim Ryan and Jerry Downie  
23 came to your office looking for Terry?  
24 **A. Yes.**

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1 Q. Do you know when that was? Was it around the end  
2 of her employment there?  
3 **A. It would be the last day she was there, yes.**  
4 Q. What do you remember about that?  
5 **A. Well, she was in my office. She was dropping off**  
6 **the paperwork.**  
7 Q. Was it work-related paperwork?  
8 **A. Yes, it was a bill of lading. And Jerry Downie**  
9 **came looking for her and asked her to meet with him in**  
10 **the office after she was done talking with me. And that**  
11 **was it.**  
12 Q. Did you know why he needed to meet with her?  
13 **A. No.**  
14 Q. Did he say?  
15 **A. No.**  
16 Q. Did she respond to him in any way?  
17 **A. She said okay, basically, I think.**  
18 Q. Okay. Was it odd to you that he was coming there  
19 to look, to get her?  
20 **A. I didn't think it was odd.**  
21 Q. Did you know what they were discussing?  
22 **A. I could take an educated guess, it was about the**  
23 **harassment suit.**  
24 Q. Is that because you were friends with her and you

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1 had talked to her about it?  
2 **A. Because I was aware of it.**  
3 Q. Okay. Now, this is something you said earlier  
4 and I want to get clarification on it. Are there times  
5 when Terry and yourself, you would walk the grounds to do  
6 your inventory?  
7 **A. I would say yes, there have been times.**  
8 Q. Did Terry tell you or were you aware of at any  
9 time that there was writing on a wall regarding Terry?  
10 **A. Writing on a wall?**  
11 Q. Outside, on a brick wall about Terry?  
12 **A. I don't remember.**  
13 Q. You don't remember. While walking around doing  
14 the inventory, do you remember seeing anything  
15 graffiti-like regarding Jerry Downie?  
16 **A. I don't recall.**  
17 MS. BREWINGTON: Do you have anything  
18 further?  
19 Okay. I don't think I have anything  
20 further. Thank you.  
21 I don't have anything further. Thank you.  
22 EXAMINATION  
23 BY MS. DIBIANCA:  
24 Q. My turn. The reports that you discussed in the

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1 very beginning of your testimony that you had been doing  
2 and then you were training Terry how to do, okay, after  
3 Terry left who took that responsibility over?  
4 **A. I'm not sure. We had several temps come through.**  
5 **But I can't recall if it was before Terry or afterward.**  
6 **But I think in the end it just finally got split up among**  
7 **the people that were already there.**  
8 Q. Okay. And that's the accounting part, I'm  
9 talking about.  
10 **A. Yes, the inventory part of it, yes.**  
11 Q. Okay. And you talked about some problems getting  
12 the necessary information from the people to do those  
13 accounting and the reports. Do you see similar problems  
14 now?  
15 **A. Yes.**  
16 Q. It is still difficult to get the necessary  
17 information to generate that report or do the inventory?  
18 **A. It has improved somewhat, but there is still room**  
19 **for improvement, is the best way for me to say that.**  
20 Q. Okay. We are going to go to Patrone 1, which is  
21 this one.  
22 **A. Okay.**  
23 Q. And in the third paragraph down --  
24 **A. Not including the first one.**

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12 (Pages 42 to 45)

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1 Q. Skip.  
2 **A. This one?**  
3 Q. Yes. Starts with "Actually."  
4 **A. The last sentence, last two sentence.**  
5 Q. It says, "Actually, you have been doing a lot  
6 more than before that's for sure." Do you recall what  
7 you meant by that?  
8 **A. I think that she, from this, from reading this,**  
9 **it means that she has been picking up on her**  
10 **responsibilities, doing more work for me that I liked her**  
11 **to do.**  
12 Q. At the time of this e-mail or about that time,  
13 was there room for her to improve her job performance?  
14 Had she learned everything and done everything at that  
15 point or she still had more work to do?  
16 **A. Well, there is always room for improvement,**  
17 **always increase the mind. There was still work she had**  
18 **to do, which was standard cost, and that's what I had to**  
19 **get her trained in.**  
20 Q. Did you have trouble training her in standard  
21 costs?  
22 **A. You know what, after the e-mail we started to get**  
23 **together, but then, like I said, she was only there for**  
24 **two weeks and that was it.**

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1 Q. Okay. Did you train the next person or people  
2 who were doing standard costs? Did you have to train  
3 them also?  
4 **A. Actually no, that part came back to me and I**  
5 **ended up continuing to do that.**  
6 Q. What about the other things that you were  
7 training her on?  
8 **A. Thinking about it now, I ended up taking back all**  
9 **the responsibility, now that I think of it, yes.**  
10 Q. Okay. I want to kind of focus on the time frame  
11 for when Terry first came to you complaining about sexual  
12 harassment. You said it was winter, correct?  
13 **A. Yes.**  
14 Q. And it would have been the last winter of her  
15 employment? Would that be right?  
16 **A. The last winter?**  
17 Q. Let me think it out here. I'll tell you, she  
18 started to work in August of 2001. So there would have  
19 been the winter of 2001 to 2002, and then the winter  
20 between 2002 and 2003.  
21 **A. Okay.**  
22 Q. So would it have been 2002/2003?  
23 **A. I would say yes. Because it wasn't that long**  
24 **period of time. That would make more sense logically.**

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1 Q. Okay. Let's go to Patrone 2. I'm just going to  
2 point it out to you because there is no paragraphs in  
3 this.  
4 **A. Okay.**  
5 Q. And then I'll point it out to Lori also.  
6 Lori, it is right here, "You said you would  
7 have done something" --  
8 MS. BREWINGTON: Okay.  
9 Q. In this e-mail from Terry to you she says that  
10 when she talked to you about her complaints, one of your  
11 responses was that, quote, you would have done something  
12 sooner and more professional.  
13 Can you explain what she might have meant or  
14 what she did mean by that, how you understood it?  
15 **A. Basically, to file a formal complaint in Human**  
16 **Resource Department against the person.**  
17 Q. And is that the advice that you gave her?  
18 **A. Yes.**  
19 Q. And can you tell me why you felt that was the  
20 right thing to do?  
21 **A. Because, because there is no other -- I don't**  
22 **know. That just came to my mind from a business**  
23 **standpoint.**  
24 Q. Okay. Now, today, in 2006, if someone came to

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1 you, a different person and said, I'm being harassed at  
2 work, would you tell them to report it to HR?  
3 **A. Yes, I would still give that advice. I mean,**  
4 **basically, there are two things I would say. One is**  
5 **report it or confront the person. That's basically what**  
6 **I would have said.**  
7 Q. And can you just give me, just in your opinion,  
8 why it is good advice, why is that the right thing to do?  
9 **A. Reporting it to human resource at least, the**  
10 **Human Resource Department can do a proper investigation.**  
11 **The other one, as far as confronting person**  
12 **to make sure there was no misunderstanding.**  
13 Q. Do you think that there was a misunderstanding in  
14 this case?  
15 **A. I think there is definitely a lot of**  
16 **communication problem, definitely.**  
17 Q. Can you explain that for me?  
18 **A. Well, a lot of times people perceive how people**  
19 **say things differently. Like when somebody says**  
20 **something to me, I could interpret it differently than**  
21 **what they intend it to be. That's what I really mean.**  
22 **It is a communication issue. The problem is, I really**  
23 **don't know the whole situation, what was going on.**  
24 Q. Did you ever see Randolph interact with Miss

13 (Pages 46 to 49)



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1 Snyder inappropriately?  
2 **A. No.**  
3 Q. Have you seen Mr. Harris interact with anyone  
4 inappropriately?  
5 **A. No.**  
6 Q. Do you think that Mr. Harris is an honest person?  
7 **A. Yes.**  
8 Q. Can you tell me anything else about his  
9 character?  
10 **A. His character?**  
11 Q. Other than he is honest?  
12 **A. I think he is nutty.**  
13 Q. He is what? Nutty?  
14 **A. He is nutty. I don't know a better word to**  
15 **describe it.**  
16 Q. Does he take responsibility for his mistakes?  
17 **A. Yes. I have seen him do that.**  
18 Q. Is there an example you can remember?  
19 **A. Well, as far as work, when there was a problem,**  
20 **if the people under him didn't do the job correctly, if I**  
21 **told him about it, you know, rather than pointing fingers**  
22 **at someone else, he actually took responsibility and**  
23 **said, "No, this is wrong. I will take care of it." And**  
24 **then he dealt with the problem.**

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1 Q. Okay. Do you think that that is unusual in the  
2 work place, generally speaking? Did he stand out for  
3 having that characteristic?  
4 **A. Yes, it is very rare that we have that, that**  
5 **somebody would admit their mistake.**  
6 Q. Okay. His reputation, did he have a good  
7 reputation in the work place?  
8 **A. Yes.**  
9 Q. Let me ask you about the lunch policy. What was  
10 the lunch policy, if there was one, at CitiSteel during  
11 Miss Snyder's employment?  
12 **A. I'm not sure what the policy itself was. I know**  
13 **like my department, basically, we get an hour lunch. And**  
14 **that's it. But I don't know if it was different in**  
15 **meltshop or whatever.**  
16 Q. Could employees leave the property during their  
17 lunch hour?  
18 **A. As far as I know, yes. I sure did.**  
19 Q. Did employees have to ask permission if they were  
20 going to leave or notify someone that they were going to  
21 be off the grounds?  
22 **A. I never had to.**  
23 Q. Okay.  
24 **A. So I would assume they don't have to.**

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1 Q. Did Terry tell you about the disciplinary  
2 write-up she received in March 2003?  
3 **A. Yes, about the job performance. Is that what you**  
4 **are talking about?**  
5 Q. Yes.  
6 **A. Yes, she did.**  
7 Q. Can you tell me what she said?  
8 **A. Only what she said in the e-mail, that, basically**  
9 **that they had her formally written up for her**  
10 **performance. I didn't take it as a disciplinary action.**  
11 **It was more like a job performance review.**  
12 Q. Those were my words, so I'm sorry if they are  
13 wrong.  
14 **A. I wanted to make sure we were talking about the**  
15 **same thing.**  
16 Q. So it was just in an e-mail, not a conversation?  
17 **A. Was she what?**  
18 Q. Was this just in an e-mail, only in an e-mail?  
19 **A. That she told me about it, yes.**  
20 Q. Was she upset about it?  
21 **A. Oh, very.**  
22 Q. Can you tell me about that?  
23 **A. Well, she was upset with me because they had**  
24 **indicated that I had said that she wasn't doing her job.**

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1 Q. Okay. I think we are talking about two different  
2 things.  
3 **A. Oh, we are.**  
4 Q. Sorry. There was actually more of a discipline,  
5 I believe like a warning, a written warning. It was  
6 signed by Greg Vurgino, Randolph Harris and Dennis Ford,  
7 and that was March 2003, beginning of March 2003, I'll  
8 represent to you. Do you remember any of that?  
9 **A. I'm thinking that was going to the job**  
10 **performance.**  
11 Q. So maybe Mr. Vurgino came to you before that  
12 write-up or related to that?  
13 **A. That's the impression I get.**  
14 Q. So go ahead. Then we are on the same page.  
15 **A. Okay.**  
16 Q. You said she was upset. Can you tell me about  
17 that?  
18 **A. Well, she was upset. She felt that they weren't**  
19 **being fair to her, and that they were really giving her a**  
20 **hard time, and she really felt that Randolph Harris was**  
21 **really the one giving her the hard time about it.**  
22 Q. Did she tell you why she thought it was only Mr.  
23 Harris?  
24 **A. Because of the sexual harassment situation.**

14 (Pages 50 to 53)

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1 Q. Did she tell you that all three of them had  
2 signed it, Mr. Vurgino, Mr. Ford and Mr. Harris, or that  
3 they --  
4 **A. I don't recall about the signing of the**  
5 **paperwork, but I do recall about them three indicating**  
6 **the same opinion, I could say that.**  
7 Q. Okay. Did she tell you that Mr. Ford had told  
8 her that it was Mr. Harris' idea?  
9 **A. No. I don't recall that being pointed out.**  
10 Q. Okay. I think I asked you this. I'm sorry, but  
11 I'm going to ask again. I don't remember. Did you have  
12 a conversation about it or was it just an e-mail, just  
13 that e-mail?  
14 **A. About the poor performance review, that was just**  
15 **mainly through the e-mail.**  
16 Q. Okay. After that point did you see any change in  
17 her behavior?  
18 **A. Upset or anything?**  
19 Q. Yes.  
20 **A. Yes, she was clearly upset by it.**  
21 Q. From that point forward until the end of her  
22 termination --  
23 **A. Mm-hmm.**  
24 Q. I'm sorry, until the end of her employment.

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1 **A. Well, repeat that again.**  
2 Q. I was just clarifying my question. I had said  
3 until the end of termination, which was the wrong word.  
4 **A. Right. But what is the question?**  
5 Q. Did you see a change in her, and you said, "Yes."  
6 And then I believe I said, "Was she upset from that point  
7 until the end of her employment, more upset?"  
8 **A. Yes, I would say she was.**  
9 Q. Can you tell me like any description of that,  
10 what made you think that?  
11 **A. Well, I think she was worried about her job.**  
12 **From my perspective, she felt very pressured.**  
13 Q. Very pressured. Was she mad at Mr. Harris?  
14 **A. Yes, I would say she would be mad.**  
15 Q. Would you say that she is an aggressive person?  
16 **A. She can be.**  
17 Q. Is she outspoken?  
18 **A. Yes.**  
19 Q. Have you ever seen her be confrontational with  
20 others?  
21 **A. I have not witnessed that, no.**  
22 Q. Does she have a reputation for being  
23 confrontational?  
24 **A. No one has ever said anything to me about that.**

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1 Q. Okay. Do you have any reason to think that she  
2 is confrontational?  
3 **A. Because she was sharing some of the stories with**  
4 **me.**  
5 Q. Some of the stories?  
6 **A. Mm-hmm.**  
7 Q. Can you give me any examples that you recall?  
8 **A. Well, like if someone said something to her**  
9 **inappropriately or did something wrong, that she thought**  
10 **was not right, she has no problem confronting the person.**  
11 **She would speak her mind.**  
12 Q. Right. Okay. Did she tell you about different  
13 times when she confronted Mr. Harris about different  
14 things?  
15 **A. She had told me that.**  
16 Q. Do you recall any examples about those?  
17 **A. I don't recall the conversation, but I do recall**  
18 **that she had confronted him about it.**  
19 Q. Were they just generally work-related things or  
20 specifically about the harassment?  
21 **A. I think it was a combination of both.**  
22 Q. She did confront Mr. Harris about various things,  
23 including the harassment?  
24 **A. Correct.**

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1 Q. Okay. What about with Mr. Ford, do you recall if  
2 she was confrontational with him?  
3 **A. Yes, she would be upset with him sometimes.**  
4 Q. And she would tell him when she was upset?  
5 **A. Yes, I would believe so.**  
6 Q. Did she have a hot temper?  
7 **A. A hot temper?**  
8 Q. Yes.  
9 **A. I would consider that the same as aggressive.**  
10 Q. Okay. I'm going to go back to this one, number  
11 2. The second line at the very end, it says, "I am the  
12 type," and then next line says, "of person not to hold  
13 things in."  
14 Do you see that, Lori?  
15 MS. BREWINGTON: Am I looking at the right  
16 one?  
17 MS. DIBIANCA: You are.  
18 MS. BREWINGTON: Towards the bottom?  
19 MS. DIBIANCA: No, second line.  
20 MS. BREWINGTON: Okay, yes.  
21 BY MS. DIBIANCA:  
22 Q. This is Patrone 10, which is also marked as  
23 Plaintiff's 210. And the line that I'm referring to  
24 says, "I am the type of person not to hold things in,"

15 (Pages 54 to 57)

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1 and this was in Terry's e-mail to you.  
2 **A. Yes.**  
3 Q. Do you think that that fairly characterizes her  
4 personality, that she is the type of person who would not  
5 hold things in?  
6 **A. Yes.**  
7 Q. Does it make sense to you, then, that she did not  
8 complain about harassment if she is not a person that  
9 would hold things in?  
10 **A. You mean to human resource?**  
11 Q. Yes.  
12 **A. Did it make sense to me?**  
13 Q. Yes.  
14 **A. In some degrees, yes.**  
15 Q. Looking back now, does it make sense to you?  
16 **A. I'm not sure how to answer that.**  
17 Q. I don't want you to guess. Do you want me to  
18 rephrase the question or you just don't know how to  
19 answer it?  
20 **A. Well, you can rephrase it. Maybe I'll be able to**  
21 **answer it then.**  
22 Q. I guess my question is: She did not complain to  
23 human resources about the allegations she made about Mr.  
24 Harris for a period of some time, I'll say, between the

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1 time she first talked to you about it and then until  
2 April of 2003. I'm just wondering, I'm just trying to  
3 figure out why she would not complain if she is the type  
4 of person who is not the type of person to hold things  
5 in, is confrontational, not afraid to speak her mind, so  
6 I'm trying to just sort of understand why that would  
7 happen. I'm wondering if you can give me any insight or  
8 if that, in fact, to you does not add up.  
9 I don't want you to guess. If you don't --  
10 **A. No, I'm not guessing. I do remember that we had**  
11 **a conversation as to the reasons why she didn't want to**  
12 **report it. One of them was she didn't want to make**  
13 **waves, didn't want it to become a public thing. And her**  
14 **intentions were just to stop it. That is the only thing**  
15 **that I could say why she didn't report it to human**  
16 **resource.**  
17 Q. Okay. So she said she did not want other people  
18 to know about her allegations?  
19 **A. Yes, she definitely didn't want anybody else to**  
20 **know.**  
21 Q. Did she spend time in your office socializing?  
22 **A. Not unusually, no.**  
23 Q. Unusually, you mean not more than others?  
24 **A. Yes. I don't like to talk very long on the job,**

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1 **so even if she does I will cut it short.**  
2 Q. You are too busy?  
3 **A. Yes.**  
4 Q. This is my last one, I promise.  
5 **A. I'm all right.**  
6 Q. Have you ever seen Mr. Harris engaged in any type  
7 of sexually inappropriate behavior at any time towards  
8 any person?  
9 **A. No.**  
10 MS. DIBIANCA: That's all I have.  
11 RE-EXAMINATION  
12 BY MS. BREWINGTON:  
13 Q. I just have one question. I think you just  
14 mentioned that in some degrees it makes sense to you that  
15 she would not tell HR. Is that correct?  
16 **A. Correct.**  
17 Q. I just want to know from you, in some way that  
18 makes sense to you, that's correct, that she wouldn't  
19 tell HR. In what way does that make sense to you?  
20 **A. Because a lot of women believe that if they**  
21 **report it they will be punished for it.**  
22 Q. And so do you think that that is what Terry  
23 thought?  
24 **A. I would -- based on my perspective, I would say**

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1 **that.**  
2 Q. What about based on what she told you, would you  
3 still agree she would be punished?  
4 **A. No, because she wasn't afraid, so I didn't really**  
5 **think that was a very big issue.**  
6 Q. So you didn't think that she was afraid of losing  
7 her job?  
8 **A. I couldn't say that. I think there was always**  
9 **that risk there and that could be one of the reasons why**  
10 **she wouldn't do it.**  
11 MS. BREWINGTON: Okay. I don't have  
12 anything further.  
13 RE-EXAMINATION  
14 BY MS. DIBIANCA:  
15 Q. I do have one more. You just said that she was  
16 not afraid?  
17 **A. Right.**  
18 Q. I just want to make sure I understand that. She  
19 just was not afraid of what? Of Mr. Harris? Was she  
20 afraid of him?  
21 **A. She was not afraid of him, no.**  
22 Q. Was she afraid generally? Generally speaking,  
23 was she the type of person who was afraid easily? I just  
24 want to make sure I'm understanding, when you say she is

16 (Pages 58 to 61)

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1 not afraid.  
2 **A. Well, she doesn't get scared easily, let me put**  
3 **it that way. I think there might have been times she**  
4 **was, but she usually bounces back.**

5 MS. DIBIANCA: Okay. That's all I have.  
6 I'm done.

7 MS. BREWINGTON: Nothing.  
8 (Proceedings conclude at 12:05 p.m.)  
9

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21  
22  
23  
24

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1 State of Delaware )  
2 )  
3 New Castle County )  
4

#### CERTIFICATE OF REPORTER

5 I, Eleanor J. Schwandt, Registered  
6 Professional Reporter and Notary Public, do hereby  
7 certify that there came before me on the 19th day of  
8 June, 2006, the deponent herein, CARMELLA PATRONE, who  
9 was duly sworn by me and thereafter examined by counsel  
10 for the respective parties; that the questions asked of  
11 said deponent and the answers given were taken down by me  
12 in Stenotype notes and thereafter transcribed by use of  
13 computer-aided transcription and computer printer under  
14 my direction.

15 I further certify that the foregoing is a  
16 true and correct transcript of the testimony given at  
17 said examination of said witness.

18 I further certify that I am not counsel,  
19 attorney, or relative of either party, or otherwise  
20 interested in the event of this suit.

Eleanor J. Schwandt  
Certification No. 125-RPR  
(Expires January 31, 2008)

DATED:

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REPLACE THIS PAGE  
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